

RESPONSE TO FCC-02-325A  
Specifically, Page 16, Section H, Paragraph 29 -

## UNLICENSED SPECTRUM

Dear Sirs:

I represent Cyber Broadcasting, L.L.C., a rural WISP (Wireless Internet Service Provider) based in Minooka, IL (population approximately 4000).

Cyber Broadcasting was founded in May of 1996, providing dialup, web hosting and leased line internet services for our small community and several nearby small towns. In 1999 our organization started testing the viability of providing higher-speed services using wireless technology. In 2000, Cyber Broadcasting began full build-out of its wireless network using the ISM bands. We now provide wireless services to clients in parts of Joliet, Shorewood, Minooka, Channahon, Plattville, and Morris, Illinois.

Our current network relies on 2.4Ghz and 5Ghz ISM equipment. Due to the license-free nature of the ISM bands, Cyber Broadcasting is able to provide affordable high speed services to small local communities in which there is no high-speed cable or DSL alternatives. We currently provide internet access, telecommuting solutions, and VPN for several area businesses and residents across our ISM-based network. We provide low-cost and in some cases, free high speed solutions to local municipal offices, police departments, and other public buildings. We are also proud to provide the vital link between our local fire department and the county 911 system.

Since the introduction of our wireless network, we have been approached by officials from other nearby small towns and we have heard from many local residents that are currently outside of range of our network. There is definitely demand from the public to receive high speed services, but we are not always in a position to provide those services. While the ISM bands have enabled us to provide services to many, the current power-restrictions and the current frequencies within the ISM bands make it impossible for WISPs to build cost-effective wireless networks capable of serving ALL of those living and/or working in rural areas and small communities.

I would like to echo the sentiments of several of my colleagues in this forum. The FCC is in a unique position to promote the development of a new industry. In the early 1990's, thousands of "mom-n-pop" ISPs built the access-points, the backbone, and the very fabric on which the internet now stands. Ten years later, we are witnessing the birth of a new industry, WIRELESS Internet Service Providers. WISPs are now bringing that same innovation, and that same spirit of community back into that internet by providing high speed internet services to communities that otherwise would go unserved.

We would like recommend to the commission that additional spectrum be allocated in the bands below 900Mhz. This spectrum should be provided license free for use by

advanced digital communications, such as broadband internet, video conferencing, and virtual private networking. Assigning such spectrum will enable WISPs to extend services to a much higher percentage of the public and will allow us to better serve our rural communities.

Our second comment to the commission is regarding the current power regulation within the ISM bands. We recognize that the power restrictions within the ISM band are in place to allow shared use of the ISM bands in congested areas. However, in areas in which population density is low, it becomes infeasible to invest in enough towers and equipment to provide universal services while still adhering to the current ISM power restrictions. We submit that the WISP industry could better utilize the current ISM bands if the power levels allowed in rural areas were raised such that we could efficiently serve a larger radius from each of our broadcast towers.

I appreciate this opportunity to provide comments to the commission regarding the future of the “public airwaves”. WISPs as an industry certainly appreciate the commission's foresight into the need to expand broadband technology through unlicensed wireless.

Sincerely,  
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